

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Thomas Dexter Jakes Plaintiff ~against~ Duane Youngblood, et al. Defendant	Civil Action No. 2:24-CV-1608-WSS NOTICE OF MOTION TO DISMISS PURSUANT TO PENNSYLVANIA'S ANTI-SLAPP STATUTE
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TO: PLAINTIFF THOMAS DEXTER JAKES AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendant, Duane Youngblood, by and through his counsel, T.A. Blackburn Law, PLLC, hereby moves this Court to dismiss Plaintiff's Complaint pursuant to Pennsylvania's Anti-SLAPP Statute, codified at 42 Pa.C.S. § 8340.11 et seq. This motion is based on the following grounds:

1. **Protected Public Expression:** Defendant's statements are protected public expression addressing matters of significant public concern, including systemic abuse and institutional accountability within religious organizations, and are therefore safeguarded by the Pennsylvania Anti-SLAPP statute and the First Amendment to the United States Constitution.
2. **Failure to State a Prima Facie Case:** Plaintiff's claims of defamation per se and civil conspiracy fail to meet the requisite legal standards under Pennsylvania law, as Plaintiff has not demonstrated falsity, actual malice, or actionable harm.
3. **Public Policy:** Allowing Plaintiff's claims to proceed would violate public policy, as it would chill constitutionally protected speech on matters of public concern and contradict the legislative intent of Pennsylvania's Anti-SLAPP statute.
4. **Entitlement to Attorney Fees:** As a prevailing party under the Anti-SLAPP statute, Defendant is entitled to an award of attorney fees, costs, and litigation expenses incurred in defending against this baseless and retaliatory lawsuit.

This motion is supported by the accompanying Memorandum of Law, the Declaration of Tyrone A. Blackburn, Esq., and the exhibits attached thereto, as well as a sworn Declaration from Defendant Duane Youngblood. Defendant respectfully requests that this Court grant the motion, dismiss Plaintiff's Complaint with prejudice, and award attorney fees and costs pursuant to 42 Pa.C.S. § 8340.18.

Dated: January 23, 2025

Respectfully submitted,
/s/Tyrone A. Blackburn, Esq.
 Tyrone A. Blackburn, Esq.
 T. A. Blackburn Law, PLLC.
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